

**UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
WACO DIVISION**

TRILOGY ENTERPRISES, INC.,

Plaintiff,

v.

TRILOGY EDUCATION SERVICES,  
INC.,

Defendants.

Civil Action No. 6:19-cv-00199

**DEFENDANT TRILOGY EDUCATION SERVICES, INC.’S UNOPPOSED MOTION  
FOR EXTENSION OF TIME TO ANSWER PLAINTIFF’S COMPLAINT**

Defendant Trilogy Education Services, Inc. (“Trilogy Education”) files this unopposed motion for extension of time to answer Plaintiff Trilogy Enterprises, Inc.’s (“Plaintiff”) Complaint (ECF No. 1).

Plaintiff filed its Complaint on March 8, 2019 and served Trilogy Education on March 11, 2019. Plaintiff filed an executed summons with the Court on April 4, indicating service occurred on March 11 (ECF No. 6). Currently, Trilogy Education’s deadline to respond was April 1, 2019. Trilogy Education’s failure to answer, move, or otherwise respond to the Complaint by or on April 1, 2019 was an inadvertent oversight and not because of any intent or purpose to ignore and cause delay in this matter or cause any hardship to Plaintiff. When this oversight was noticed, Trilogy Education’s counsel took immediate steps to confer with Plaintiff’s counsel to discuss an unopposed extension. Counsel for Plaintiff and Trilogy Education met and conferred to discuss the requested relief on April 12, 2019, and Plaintiff’s counsel indicated they did not oppose the relief sought in this motion.

Trilogy Education therefore respectfully requests an extension of time of 30 days, up to

and including May 1, 2019, to answer the Complaint. No prior extension of time has been requested.

Accordingly, Trilogy Education respectfully requests that the Court issue the attached proposed order extending the time to answer Plaintiff's complaint to May 1, 2019.

Dated: April 15, 2019

Respectfully submitted,

By: /s/ Brady Cox  
Brady Cox (TX Bar No. 24074084)  
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*Attorney for Defendant Trilogy Education  
Services, Inc.*

**CERTIFICATE OF SERVICE**

I hereby certify that all counsel of record who are deemed to have consented to electronic service are being served with a copy of this document via the Court's CM/ECF system on April 15, 2019.

*/s/ Brady Cox*  
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Brady Cox